Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

FINAL PERMIT

PERMITTEE

Gulf Coast Bulk Equipment, Inc.
13230 Eastern Avenue #5
Palmetto, FL 34221

Authorized Representative:
Mr. William J. Roy, Vice President

Air Permit No. 0810231-003-AC
Permit Expires: 07/01/2016
Site Name: Port Manatee Facility
Minor Air Construction Permit
Project: Addition of radial stacker and prilled sulfur

This is the final air construction permit to add a radial stacker to the authorized methods for unloading various types of bulk materials and to add prilled sulfur to the current list of allowable materials. The proposed work will be conducted at the Port Manatee Facility (Standard Industrial Classification No. 4491). The facility is located in Manatee County at 13230 Eastern Avenue #5 in Palmetto, Florida. The UTM coordinates are Zone 17, 345.47 km East, and 3057.90 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

for

Kelley M. Boatwright
Permitting & Waste Cleanup
Program Administrator
Southwest District

June 29, 2015
Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. William J. Roy, Vice President, Gulf Coast Bulk Equipment, Inc. (opsgcbe@aol.com)

Mr. Tom T. John, P.E., Tom John, P.E., Inc. (tjengr@msn.com)

Mr. Steve Tafuni, Compliance Assurance Program (Steven.Tafuni@dep.state.fl.us)

Ms. Danielle Henry, Compliance Assurance Program (Danielle.D.Henry@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Rhonda Hughes
(Clerk)

June 29, 2015
(Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility consists of a bulk materials handling facility that unloads various bulk materials from ship for distribution by truck or railcar to customers. The existing facility consists of the following emissions unit (EU).

Facility ID No. 0810231

EU ID No.	Emissions Unit Description
001	Bulk Materials Handling Operation

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Project Description

The applicant proposes to add a radial stacker to the authorized methods for unloading various types of bulk materials and also add prilled sulfur to the current list of allowable materials.

Exempt Emission Sources/Activities

No exempt activities at this facility.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutant PM_{10}. The PM emission limitation in this permit will ensure that the facility's PM_{10} emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces Construction Permit No. 0810231-001-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air and Solid Waste Permitting Program. The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection
Southwest District Office
Air and Solid Waste Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air_Permitting@dep.state.fl.us

All documents related to applications for permits shall be submitted to the above e-mail address and/or address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address, phone number and e-mail address is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700
E-mail: SWD_Air@dep.state.fl.us

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above e-mail address and/or address.

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions; and

d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit - This permit authorizes modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation after completing all modifications authorized by the permit. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. copies of the most recent month of records/logs specified in Specific Condition No(s). A.9.

[Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

A. EU No. 001 – Bulk Materials Handling Operation

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emissions Unit Description
001	*Bulk Materials Handling Operation – The bulk materials handling operation consists of a ship unloading material via the ship's crane(s) with clamshell(s), a shore crane with a clamshell, or the ship's self-unloading equipment to a truck directly and/or up to three (3) receiving hoppers. The hoppers may be located at various berths and there are typically two (2) portable receiving hoppers and one (1) stationary receiving hopper.* *One (1) truck at a time may directly receive material from the ship's self-unloading equipment.* *Material in a receiving hopper is transferred to a truck under the receiving hopper. Each truck loading hopper may only load one (1) truck at any one time.* *Material in a truck is either driven off-site to customers or unloaded to on-site outside storage pile(s). For on-site storage, material is unloaded from trucks to a stationary hopper feeding a conveyor and radial stacker which delivers the material to the storage pile(s).* *Material is not transferred from one storage pile to another storage pile.* *Front-end loaders then transfer the material in the on-site outside storage piles to trucks and/or railcars for off-site delivery to customers.*

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity – The emissions unit shall transfer material from a ship to a truck directly and/or up to three (3) receiving hoppers by using the ship's crane(s) with clamshell(s), a shore crane with a clamshell, or the ship's self-unloading equipment.
[Construction Permit No. 0810231-001-AC]

A.2. Operating Requirements – The permittee shall comply with the following:

a. The three (3) hoppers for truck loading shall each be clearly marked/labeled as "HOPPER No. 1", "HOPPER No. 2", and "HOPPER No. 3".

b. The three (3) receiving hoppers and one (1) direct truck loading operation may operate simultaneously.

c. There are no material splitters between the hoppers.

d. There is no emission point between the ship and the ship's self-unloading equipment.

[As requested in permit application received on April 6, 2015]

A.3. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Construction Permit No. 0810231-001-AC]

A.4. Authorized Materials – The materials allowed to be handled and transferred at this emissions unit are as follows:

Material(s)	Moisture %	Emission Factor "E" (lbs/ton) (1)	Water Spray Required to Be Applied At All Times? (2)	Comments
Bauxite (without dust suppressant)	N/A	1.1	Yes	
Potassium Nitrate (PPN)	0.10	0.24	Yes	Prilled Product
Sodium Potassium Nitrate/Soda Pot	0.13	0.17	Yes	Prilled Product
Standard Muriate of Potash	0.13	0.17	Yes	Fine Grade
Granular Sulfate of Potash-Magnesium (KMAG)	0.15	0.14	Yes	Granulated Product
Std. Sulfate of Potash-Magnesium (KMAG)	0.15	0.14	Yes	Fine Grade
Lime rock stone/aggregate	0.17	0.12	Yes	Pebbled
Granular Muriate of Potash	0.18	0.11	Yes	Granulated Product
Ammonium Nitrate (AN)	0.18	0.11	Yes	Prilled Product
Prilled Sulfur	2.00	0.067	Yes	
Calcium Ammonium Nitrate (CAN)	0.30	0.052	Yes	Prilled Product
Urea	0.40	0.035	Yes	Prilled Product
Salt/Evaporative Salt/Sea Salt	0.50	0.026	Yes	Lumps/Pellets
Grains	1.00	0.0097	Yes	
Magnetite/Ferrous Oxide	1.00	0.0097	Yes	
Millscale	1.00	0.0097	Yes	
Lime rock stone/aggregate	1.00	0.0097	Yes	Pebbled
Fly Ash/Bed Ash	1.00	0.0097	Yes	
Petcoke/Coke	1.00	0.0097	Yes	
Monoammonium Phosphate (MAP)/ Granular Monoammonium Phosphate (GMAP)/ Standard Monoammonium Phosphate (SMAP)/ GMAP 1152/ GMAP 1050/ Potassium Monoammonium Phosphate (KMAP)	1.00	0.0097	Yes	Prilled/Granular Products Materials Not Oiled
Diammonium Phosphate (DAP)	1.00	0.0097	Yes	Prilled Product
Standard Sulfate of Potash (SOP)	1.00	0.0097	Yes	Fine Grade
Granular Sulfate of Potash (SOP)	1.00	0.0097	Yes	Granulated Product
Ammonium Sulfate (AS)	1.00	0.0097	Yes	Granulated Product
Gravel		0.0069	No	
Stone/Rock		0.0069	No	
Granular Triple Super Phosphate (GTSP)	1.50	0.0055	No	Prilled Product
Magnesium Sucrate	1.50	0.0055	No	
Sugar	1.60	0.0050	No	

Material(s)	Moisture %	Emission Factor "E" (lbs/ton) (1)	Water Spray Required to Be Applied At All Times? (2)	Comments
Glass/ Glass Cullets	1.70	0.0046	No	Chips
Animal Feed Phosphate/ Biofos/ Dynaphos/ Bio Feed/ Biofeed/ Bio Feed (M)/ Biofeed (M)/ Animal feed Ingredient (AFT)/ Feed/ DiCal/ MCP/DCP	1.8	0.0043	No	
Phosphate Rock/ Phos. Rock	2.00	0.0037	No	Fine Product
Sand/ Rutile Sand/ Mineral Sand/ Silica	2.00	0.0037	No	
Compound/ Mixed Fertilizers/ANK/Ammonium Nitrate with Potassium/ 21-0-21	3.00	0.0021	No	
Ferrous Sulfate/ Iron Ore	4.00	0.0014	No	
Coal Slag/ Metallic Slag	4.00	0.0014	No	
Iron Scrap Metal	4.00	0.0014	No	
Wood Chips	4.00	0.0014	No	
Filler Material	4.00	0.0014	No	
Peanut Hulls	4.00	0.0014	No	
Bauxite (with dust suppressant)	4.00	0.0010	No	Polymer is applied to reduce/ eliminate visible emissions
Monoammonium Phosphate (MAP)/ Granular Monoammonium Phosphate (GMAP)/ Standard Monoammonium Phosphate (SMAP)/ GMAP 1152/ GMAP 1050/ Potassium Monoammonium Phosphate (KMAP)		0.0010	No	Prilled/ Granular Products Materials are Oiled
Dolomite	5.20	0.0010	No	
Vermiculite/ Verlite	6.50	0.00070	No	Medium-sized flakes
Coal Slag/ Metallic Slag	8	0.00050	No	Lumps
Citrus Pellets/ Citrus Chips/ Flakes	9.30	0.00040	No	Pelletized, moist
Gypsum	10.00	0.00040	No	
Kieserite/MGO	12.00	0.00030	No	High Moisture
Calcium Nitrate (CN)	15.00	0.00020	No	Prilled Product
Pumice	16.00	0.00020	No	Aggregates
Aluminum Hydrate	34.50	0.00010	No	Granules/lumps

Notes:

(1) – Emission factors shown are uncontrolled emission factors based on emission factors provided in AP-42, Sections 11.12.2 and 13.2.4.3, which are further detailed in the revised

Table 2-1 submitted on June 1, 2011 as part of the application for Construction Permit No. 0810231-001-AC.

(2) Additional PM control efficiency of 90% may be used when water spray is required.

Materials shown above are ranked from being expected to produce the most emissions (top) to the least emissions (bottom). Materials that are not listed above and have an "Emission Factor" equal to or greater than 0.0097 must have prior approval from the Permitting Authority before being handled. Materials that are not listed above and have an "Emission Factor" less than 0.0097 do not need prior approval from the Permitting Authority before being handled. Written notification of the material(s) data showing rank of dustiness must be submitted to the Permitting Authority whether prior approval is needed or not. The written notification and material data, for the material(s) that need prior Permitting Authority approval, shall be submitted far enough in advance so the Permitting Authority can properly process the request in accordance with the applicable regulations. The written notification and material data, for the material(s) that do not need prior Permitting Authority approval, shall be submitted at least 3 working days prior to the date of handling the material(s).
[Construction Permit No. 0810231-001-AC]

EMISSIONS STANDARDS

A.5. Particulate Matter Emission Limitation – Particulate matter emissions from this emissions unit combined shall not exceed 48 tons per any consecutive 12-month.
[Construction Permit No. 0810231-001-AC]

A.6. Visible Emission Limitation – Visible emissions from this emissions unit shall not be equal to or greater than 20% opacity.
{Permitting Note: Routine scheduled visible emission testing is not required. See No. 8.c. in Section 4. Of Appendix D. regarding Special Compliance Tests.}
[Rule 62-296.320(4)(b), F.A.C. and Construction Permit No. 0810231-001-AC]

A.7. Reasonable Precautions to Control Unconfined Particulate Matter – All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. This provision is applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, and handling. Reasonable precautions shall include but are not limited to the following:

Ship to Hopper(s) Operations

a. Tight-lipped clamshells to prevent material leakage shall be used for all materials other than scrap iron.

b. To the extent feasible ensure that the clamshells do not have "excessive" product buildup inside and outside of the clamshell. If needed, stop the operation and perform cleaning of the clamshell.

c. Each receiving hopper shall be equipped with permanent or temporary removable wind shields on all 4 sides at all times. The wind shields shall be installed from the top of the hopper ascending upward either in a vertical direction or in an upward-and-outward direction at an angle that is no less than the acute angle between the hopper's side and the horizontal.

d. All wind shields shall be not less than 4 feet high from the top of the wind shield to the top of the associated hopper side as measured in the vertical.

Ship to Hopper(s) and/or Ship Directly to a Truck

e. The clamshell(s) /ship's self-unloading equipment shall be operated at an optimum speed compatible with the receiving hopper or when directly loading a truck so as to minimize emissions and overfilling the hopper or truck. The clamshell(s) shall not leak in such a way that during normal operation there is visible discharge of material falling from the clamshell bucket. When the clamshell is full of material in the ship's hold, it will be closed completely (except for scrap iron) prior to being raised past the top of the ship's hatch, maintained closed during transfer, and will discharge the contents of the bucket only at or as close as possible to the surface of the material. The ship's self-unloading equipment shall minimize the material drop height to the maximum extent, where feasible and possible.

f. A tarpaulin or equivalent shall be placed between the dock and the ship when the clamshells are transferring material. The tarpaulin shall be positioned below the clamshell's arc of travel such that any material spilled will be contained on the dock. The contained material along with other spills of material shall be cleaned-up by shoveling and/or sweeping before the end of the next shift.

Hopper to Truck Operations

g. Open areas between the top of each hopper and the top of the hopper's support truck entrance side and the top of the hopper's support exit side shall be covered. The coverings may consist of canvas, tarpaulins, or other similar materials.

h. The two (2) sides of each hopper's support from the top of hopper to the ground that are not used for the truck entrance or exit shall be covered with the exception of the main way entrances. The coverings may consist of canvas, tarpaulins, wood, or similar material. An operator must access this area of the hopper to operate the hopper's material transfer.

i. The distance from the bottom of each hopper (discharge point) to the top of the truck's side walls shall not exceed five (5) feet as measured in the vertical.

General

j. Unconfined emissions associated with the on-site traffic (trucks and front-end loaders) are controlled by limiting vehicle speed under permittee's control to below 10 miles per hour.

k. Curtailing operations or ceasing operations when necessary.

l. Sweep roadways and other paved areas under permittee's control as necessary to prevent particulate matter from becoming airborne.

m. Watering roads and other paved areas under the permittee's control as necessary to prevent particulate matter from becoming airborne.

n. Front-end loaders shall minimize the material drop height to the maximum extent, where feasible and possible.

o. No air blowers shall be used in the ship's hold(s) to gather material for the final clean out of the cargo hold(s).

p. Water sprays required to be used for the materials as shown in the Table (also see Note No. 2) in Specific Condition No. A.4. shall be utilized whenever these materials are being transferred. The water sprays shall be located at the entrance to the hoppers and at the material drop point to trucks and railcars.

q. As necessary, water sprays shall also be located around the outdoor storage piles and shall be re-located / adjusted to encompass the area disturbed by the frontend loader.

In order to determine if the above reasonable precautions are adequate, visible emissions from all activities should not exceed 10% opacity. If this value is exceeded, it will not be considered a violation in and of itself, but an indicator that additional reasonable precautions may be required.
[Rule 62-296.320(4)(c), F.A.C. and Construction Permit No. 0810231-001-AC]

NOTIFICATION REQUIREMENTS

A.8. Notification of Operation Commencement – The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 001 after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.9. Recordkeeping Requirements – In order to demonstrate compliance with Specific Condition Nos. A.4. and A.5., the permittee shall maintain the following records:

Daily (when operating)

a. Facility name, Facility ID (0810231), Emission Unit ID No. 001, Date (month/day/year).

b. The name of each material transferred.

c. Identify the number of transfer points for each material and the description of the transfer point. Examples of a transfer point are: 1) Clamshells to all hoppers; 2) ship's unloading equipment to trucks; 3) hoppers to all trucks; 4) trucks to all outside storage piles; 5) front-end loaders to all trucks and/or railcars. A transfer point is not where material in the ship's hold is being transferred to a clamshell or where material in an outside storage pile is being transferred to a front-end loader.

d. The amount of each material transferred through each transfer point in tons.

e. Total hours of transferring materials. Do not double count simultaneous activities.

Monthly

f. Facility name, Facility ID (0810231), Emission Unit ID No. 001, Date (month/year).

g. Total amount of each material transferred in tons.

h. Total amount of all materials transferred in tons.

i. Most recent consecutive 12-month period combined total amount of all materials transferred in tons.

j. Total hours of transferring all materials. Do not double count simultaneous activities.

k. Most recent consecutive 12-month period total hours of transferring all materials. Do not double count simultaneous activities.

l. The tons of particulate matter emissions for each material transferred in tons.

m. The tons of particulate matter emissions for all materials transferred in tons.

n. The most recent consecutive 12-month total tons of particulate matter emissions for all materials transferred.

Daily records shall be completed within five (5) business days and monthly records shall be completed by the end of the following month. The emission calculations shall be completed by using the applicable emission factor and utilizing Foot Note (2), as appropriate, in the Table as shown in Specific Condition No. A.4. The records shall be maintained at the facility for at least three (3) years and made available to the Compliance Authority upon request.
[Rule 62-4.160(14), F.A.C. and Construction Permit No. 0810231-001-AC]